



# Exelon Generation®

10 CFR 2.201

RA-16-069

August 4, 2016

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Oyster Creek Nuclear Generating Station  
Renewed Facility Operating License No. DPR-16  
NRC Docket No. 50-219

Subject: Reply to a Notice of Violation; EA-16-057  
Inspection Report No. 05000219/2016010;

Reference: U.S. Nuclear Regulatory Commission Letter to Exelon Generation, Oyster Creek Nuclear Generating Station – Final Significance Determination for a White Finding with Assessment Follow-up and Notice of Violation – Inspection Report 05000219/2016010, dated July 6, 2016.

The referenced letter identified a violation that has been considered for escalated enforcement action related to an NRC inspection performed at the Oyster Creek Nuclear Generating Station (OCNGS) involving the failure by Exelon Generation Company, LLC (Exelon) to maintain a flexible coupling hose, which provides cooling water to the Emergency Diesel Generator (EDG) No. 1. The letter is considered a notice of escalated enforcement action and, therefore, requires a response in accordance with NRC Enforcement Policy. Exelon accepts the violation of low to moderate safety significance (White).

As requested per the NRC in the referenced letter the following is OCNGS response:

1) The Reason for the Violation:

Failure by Exelon to maintain a flexible coupling hose, which provides cooling water to the Emergency Diesel Generator (EDG) No.1, in support of its safety function. Specifically, the flexible coupling hose was in service for approximately 22 years and subjected to thermal degradation and aging that eventually led to the failure of EDG No. 1 on January 4, 2016. Additionally, Exelon violated Technical Specification 3.7.C, since EDG No. 1 was determined to be inoperable for greater than the technical specification allowed outage time of seven days.

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2) The corrective steps that have been taken and the results achieved:

OCNGS, in order to correct the issue identified with the failure of EDG No. 1 and to ensure that a similar failure would not occur on the EDG No. 2, replaced the failed right bank and the non-failed left bank cooling water tank-to-pump inlet flexible hose on EDG No. 1 and replaced left and right bank cooling water tank-to-pump inlet flexible hoses on EDG No. 2. EDG No.1 was returned to operable status on January 5, 2016. The station also developed an EDG Performance Improvement Plan and as part of the corrective steps OCNGS performed a Root Cause Investigation.

The following actions were created and completed out of the Root Cause Investigation:

- Performed the following reviews and documented any gaps identified: Identified other nonmetallic flexible hoses within the Emergency Diesel Generator system and compared against the current Preventive Maintenance (PM) Program. Implemented additional PMs and Corrective Maintenance (CM) to address any gaps identified during the review that will ensure that all non-metallic flexible hoses within the EDG system meet the requirements of the Performance Centered Maintenance (PCM) Template. – Actions Completed April 21, 2016
- Performed the following reviews and documented any gaps found: Reviewed the PM Program for the EDGs to ensure preventive maintenance is consistent with PCM template, vendor's recommendations, Appendix 1 of Procedure 636.1.010, Revision 25, and all learnings from the EDG Excellence Team. This review included a walkdown to identify components that do not have a Component Record Listing (CRL). Implemented additional actions to address gaps identified during the review (e.g., PMs, CMs, etc.). – Actions Completed April 21, 2016
- Document CA review of Work Order C2035542 that replaced the failed hose on EDG No. 1. – Action Completed April 22, 2016
- Documented CA review of Work Order C2035546 that replaced the hoses on EDG No. 2. – Action Completed April 13, 2016
- Increased the scope of the inspection to include coolant hose replacement (Met Tower Back-up Generator) every 12 years with the initial replacement in 2016 due to age of component. – Action Completed April 23, 2016

3) The corrective steps that will be taken:

The following corrective actions were created out of the Root Cause Investigation and are awaiting completion:

- Replace Flexible Fuel Line, Y-39-8 on EDG No. 2 in the next window of sufficient duration – Due December 30, 2017.
- Replace Fuel Oil Hose on Fire Diesel Engine No. 1 in the next window of sufficient duration – Due December 16, 2016.
- Replace Lube Oil Hose on Fire Diesel Engine No. 1 in the next window of sufficient duration – Due December 16, 2016.
- Replace Oil Hose on Turbocharger on Fire Diesel Engine No. 1 in the next window of sufficient duration – Due December 16, 2106.
- Implement a case study to address knowledge weaknesses of station personnel related to EDG reliability, top 10 PRA issues, and charter development (problem statement development, desired outcome, and engaging the correct people) along with the 5 weak/ineffective/failed barriers identified in the Barrier Analysis of the Root Cause as determined through the systematic approach to training. – Due September 30, 2016

4) The date when full compliance will be achieved:

OCNGS achieved full compliance on January 5, 2016 at 0141 when EDG No.1 was declared operable following replacement of the failed right bank and the non-failed left bank cooling water tank-to-pump inlet flexible hose, and following satisfactory completion of EDG No.1 Operability Surveillance Test.

The NRC completed the separate supplemental inspection for this White Finding in accordance with Inspection Procedure (IP) 95001 during the week of July 25, 2016 which exited on July 29, 2016. The NRC inspection team final report is expected to be published within 45 days of the inspection.

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Should you have any questions concerning this letter, please contact Michael McKenna,  
Regulatory Assurance Manager, at (609) 971-4389.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Stathes". The signature is written in a cursive, flowing style.

Garey Stathes  
Site Vice President  
Oyster Creek Nuclear Generating Station

cc: USNRC, Administrator, Region I  
USNRC, Senior Resident Inspector - OCNCS